

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANGELA D. JONES

Defendant.

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Criminal No. 14-CR-30116

**STIPULATION OF FACTS**

The attorney for the Government and the Defendant stipulate to the following:

1. That **ANGELA D. JONES** defrauded the State of Illinois Medicaid Home Services Program by falsely claiming and taking payments for personal assistant services not actually performed. The State of Illinois pays a personal assistant hourly wages for performance of services for a qualified beneficiary. The qualified beneficiary must have a written Employment Agreement with the personal assistant and a Service Plan listing all services to be provided. In order for the personal assistant to receive payment from the State of Illinois, the beneficiary must submit a Home Services Time Sheet form listing the hours worked by the personal assistant and signed by both the beneficiary and personal assistant.

2. The Home Services Program is a Medicaid Waiver Program designed to provide a disabled individual who, with assistance in performing daily living activities in the home, would not require similar care in a nursing home. The Illinois Department of Human Services, Division

of Rehabilitation Services (DORS) administers the program. Medicaid Waiver programs enable states to use both state and federal Medicaid funds to pay for services related to medical care that would not ordinarily be covered under Medicaid.

3. On July 1, 2004, customer completed an Employment Agreement with his personal assistant who was his girlfriend, JONES.

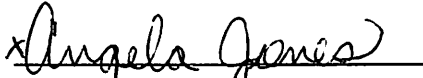
4. On January 15, 2008, a letter was sent to the DHS office signed by JONES stating:

*I Angela Jones Have just returned to work for Mr. Thigpen and as of right now I'm not settled completely and as of right now I would very much like to have my mail and my check sent to Mr. Thigpen's address, which he has agreed to this arrangement. Thank you.*


5. On or about October 15, 2008, and August 31, 2012, in furtherance of a scheme to defraud the Medicaid Home Services Program for the State of Illinois, JONES submitted Home Services Time Sheets of which falsely claimed hours of personal assistant services that were not performed. JONES signed the October 15, 2008, and August 31, 2012, time sheets under the following printed statement:


*I CERTIFY THE ABOVE INFORMATION IS TRUE AND THE CUSTOMER WAS IN HIS/HER HOME AT THE TIME SERVICES WERE RENDERED (NOT ON VACATION, IN HOSPITAL, IN NURSING HOME, ETC.).*

**IT IS SO STIPULATED.**

  
ANGELA D. JONES  
Defendant

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STEPHEN R. WIGGINTON  
United States Attorney

  
G. ETHAN SKAGGS  
Attorney for Defendants

  
RANLEY R. KILLIAN  
MICHAEL HALLOCK  
Assistant United States Attorney

Date: 3/5/15

Date: 3/12/15